

**MILMAN LABUDA LAW GROUP PLLC**  
3000 MARCUS AVENUE  
SUITE 3W8  
LAKE SUCCESS, NEW YORK 11042

TELEPHONE (516) 328-8899  
FACSIMILE (516) 328-0082

Author: Colleen O'Neil - Partner  
Direct E-Mail Address: [colleen@mlaborlaw.com](mailto:colleen@mlaborlaw.com)  
Direct Dial: (516) 303-1395

January 20, 2025

**VIA ECF**

Hon. Steven I. Locke  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: *SiteOne Landscape Supply, LLC v. Nicholas Giordano, et al.*  
Case No.: 2:23-cv-2084-GRB-SIL

Dear Judge Locke,

We represent all Defendants in the above-referenced matter. We write to respectfully request a two-week extension of time for Defendants to serve and file their opposition to Plaintiff's motion for sanctions, which was served and filed after business hours on January 17, 2025, the Friday before the long holiday weekend. ECF No. 185

There is good cause for the requested extension. Pursuant to this Court's Individual Motion Practices, Sec. 4(A)(1), Plaintiff's decision to file its motion late on the Friday of this past holiday weekend, effectively leaves Defendants with one workday to oppose. This simply is not enough time to properly respond to the serious allegations leveled by Plaintiff against each of the three individual Defendants in this action – Don, Nick, and Vic. Indeed, Plaintiff's motion is riddled with factual inaccuracies and conclusory statements, each of which needs to be addressed so that the Court has an accurate account of the facts related to the deletion of any text messages. This will entail working with each of the individual Defendants, and working around each of the individual Defendant's busy schedule. Given the gravity of the allegations before the Court, it is imperative that Defendants have sufficient time to properly respond to Plaintiff's motion. Accordingly, we respectfully request that the deadline for Defendants to serve and file their opposition to Plaintiff's motion be extended two weeks to February 4, 2025.

Defendants attempted to obtain Plaintiff's consent for this request for an extension, but have not heard back.

Hon. Steven I. Locke, U.S.M.J.  
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We thank you for your attention to this matter.

Respectfully submitted,

**MILMAN LABUDA LAW GROUP PLLC**

/s/ Colleen O'Neil

cc: All counsel of record via ECF.